UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region08

Ref: 8EPR-N

MAY 23 2011

Brian Ferebee, Forest Supervisor
Uinta-Wasatch-Cache National Forest
c/o Rick Schuler
Evanston-Mountain View Ranger District
P.O. Box 1880
Evanston, WY 82931

RE: EPA Comments on Draft Environmental Impact Statement, Blacks Fork Salvage Project, CEQ # 20110102

Dear Mr. Ferebee:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4321, *et seq.*, and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the March 2011 Draft Environmental Impact Statement (DEIS) for the Blacks Fork Salvage Project. This DEIS was prepared by the Evanston-Mountain View Ranger District of the U.S. Department of Agriculture Forest Service (USFS) Uinta-Wasatch-Cache National Forest to analyze potential environmental impacts associated with vegetation treatments developed in response to the continuing mountain pine beetle epidemic in the area. The primary purposes of the project are to salvage dead lodgepole pine; provide wildlife habitat improvements to aspen, willow, and lodgepole habitats; reduce overall fuel loadings in treated stands; and allow adequate access to private lands within the project area.

The Blacks Fork Salvage Project area covers 39,800 acres and lies approximately 20 miles southeast of Evanston, Wyoming, in Summit County, Utah. The analysis area includes Lyman Lake, Little Lyman Lake, and Meeks Cabin Reservoir; several developed or dispersed camping areas (e.g., Meeks Cabin Campground, Lyman Lake Campground, and Layton Stake Youth Camp); and trailheads/trails. Some proposed treatment areas are adjacent to private land.

Three alternatives are analyzed in the DEIS: Alternative 1 (No Action); Alternative 2 (Preferred Alternative); and Alternative 3 (based on issues from scoping). Both action alternatives would treat approximately 2,577 acres of aspen, mixed aspen/lodgepole, and willow communities within the 39,800 acre project area using harvest, prescribed fire, and mechanical fuels treatments. A brief summary of the alternatives is as follows:

- Alternative 1 – No Action - No vegetation management treatments would occur.

- Alternative 2 (Preferred Alternative) – Vegetation treatments on 2,577 acres would include timber salvage (clearcut on approximately 553 acres of lodgepole pine and sanitation harvests on approximately 444 acres of lodgepole pine and mixed conifer/aspen), as well as prescribed fire on mixed aspen-conifer communities (approximately 560 acres salvaged and then treated with prescribed fire and approximately 970 acres treated with only prescribed fire). Approximately 50 acres near Lyman Lake campground would receive mechanical treatments such as thinning and hand felling. Total temporary road construction that may be necessary to access specific treatment units would be 10.6 miles, although 1.5 miles of that amount would be existing logging roads that are not considered system roads but already have a road prism in place.

- Alternative 3 – Vegetation treatments on 2,557 acres would include timber salvage (clearcut on approximately 544 acres of lodgepole pine and sanitation harvests on approximately 433 acres of lodgepole pine and mixed conifer/aspen). The prescribed fire and mechanical treatment components would be the same as Alternative 2. Total temporary road construction that may be necessary to access specific treatment units would be 9.6 miles, although 2.0 miles of that amount would be existing logging roads that are not considered system roads but already have a road prism in place.

We have reviewed the March 2011 DEIS and have concerns related to the following issues: (1) air quality; (2) aquatic resources; and (3) habitat and special status species. These concerns are the basis for the EPA rating discussed at the conclusion of this letter.

Air Quality

The DEIS includes a qualitative discussion of air quality, noting that current air quality conditions in the project vicinity are good and there are no mandatory Class I Federal areas in the region. We want to emphasize that EPA's Clean Air Act implementing regulations require states to submit State Implementation Plans that, among other things, demonstrate attainment or maintenance of the National Ambient Air Quality Standards (NAAQS) and protection of the Prevention of Significant Deterioration (PSD) increments. Actions by Federal Land Managers that lack adequate mitigation of air quality impacts could impede a state's ability to meet Clean Air Act requirements.

Data: EPA is concerned that no specific air quality data regarding existing conditions are provided in the DEIS, even though it appears such data are readily available from the Utah Department of Environmental Quality (UDEQ) and/or the EPA AirExplorer web site (http://www.epa.gov/airexplorer/). In addition, the DEIS should disclose regional issues regarding wintertime ozone and $PM_{2.5}$ concerns. Information regarding current conditions will be an important tool for monitoring the impacts of the various activities contemplated under the preferred alternative. Decision-makers will need to understand baseline conditions in an effort to ensure that Blacks Fork Salvage Project activities, when combined with air quality impacts from external sources, do not adversely impact the NAAQS. At a minimum, the Final EIS should summarize existing air quality in and around the project area and should identify sensitive receptors (such as surrounding population centers and other sensitive Class II areas in the vicinity).

Prescribed Fire: The action alternatives of the Blacks Fork Salvage Project include the application of prescribed burning to approximately 1,530 acres. This prescribed fire activity may cause degradation of air quality in the region. The DEIS notes that the USFS must submit to its executive secretary the required pre-burn information and individual burn plans for this project, which would quantify expected emissions from the prescribed burns. However, EPA is concerned that the DEIS does not contain any air impact analysis presenting direct, indirect, or cumulative air quality impacts that would be associated with prescribed burning. Such information should be disclosed in the Final EIS to fully inform the public as well as the decision-maker to ensure protection of air quality if the prescribed burns are ultimately conducted.

In addition, we note that USFS intends to comply with UDEQ air quality permitting requirements for prescribed burning and to follow guidance in the State smoke management plan. We recommend that USFS consult with UDEQ for any modeling, mitigation, or other measures required under State regulations or the State Implementation Plan to address Clean Air Act requirements. Further, the DEIS references design criteria and mitigation measures that will be described in required pre-burn information and burn plans; however, we recommend that the Final EIS provide the specifics, including: (1) discussion of appropriate smoke monitoring techniques and mitigation (including meteorological conditions favorable for mitigated prescribed fire smoke and alternatives to prescribed fire such as mechanical fuel reduction methods); (2) requirements for the incorporation of the Interagency Prescribed Fire Planning and Implementation Procedures Guide (July 2008) into the site-specific burn plans designed for each prescribed burn conducted under this project; and (3) how the public will be notified of pending burns. We appreciate that the Scoping and Public Involvement section of the DEIS includes some discussion of these requirements, and we recommend that they be incorporated in more detail into the project specific design criteria/mitigation discussion and/or the Air Quality section.

Salvage-Related, Transportation-Related, and Dust-Related Emissions: Air quality is also negatively impacted by emissions from heavy diesel equipment utilized for salvaging/thinning of trees, idling trucks used for transportation of wood products, and dust generated from proposed activities. EPA is concerned that the DEIS does not contain an inventory of predicted emissions that would be associated with the salvaging/thinning of trees and the associated project activities. The Final EIS should include such an emissions inventory. If emissions are significant, then the Final EIS also should include an air impact analysis presenting direct, indirect and cumulative impacts of these activities.

Further, these emissions should be addressed through project design criteria and monitoring. Example measures to consider include the following:

- Prohibit unnecessary idling of transportation trucks;
- Use low-sulfur or alternative fuels;
- Require heavy diesel equipment to use cleanest available engines or retrofits with diesel particulate control technology;
- Maintain engines;
- Expand application area for dust abatement measures and require detailed plans for dust control;
- Require prompt revegetation along new roadways and monitor for five years post- revegetation to ensure success; and
- Monitor effectiveness of road closures after project completion.

Indirect Emissions: The indirect impacts from the use of salvaged and/or thinned trees for fuel should be discussed in the DEIS. The DEIS should describe the likely end use for the wood products to be generated and should assess any air emissions that may result. For instance, if any of the salvaged timber would be used as feedstock for supplying fuel at a facility that provides heat and/or power, or would be converted to wood pellets or biofuels, then the DEIS should include a discussion of the specific use and related air quality impacts, including greenhouse gas (GHG) emissions. There may be mitigation options available to address these indirect emissions.

Cumulative Impacts: Table 3.1, Past, Present, and Reasonably Foreseeable Future Activities, lists oil and gas development as slated for 2015 in the West Fork area. Potential air quality impacts from this development should be included in the air quality cumulative effects discussion of the Blacks Fork Salvage Project DEIS.

Climate Change: We recommend that the Climate Change section on page 9 of the DEIS be expanded to include a discussion of how the USFS can reduce the impacts of project activities on climate change and monitor for effects of climate change on forest resources. In addition, we recommend the EIS include an analysis and disclosure of greenhouse gas (GHG) emissions. To fully inform the decision-makers and the public of project activity GHG emissions and potential climate change impacts, we recommend a four-step approach:

1. Quantify and disclose projected annual and total project lifetime cumulative GHG emissions in CO_2-equavalent terms and translate the emissions into equivalencies that are easily understood from the public standpoint (e.g., annual GHG emissions from x number of motor vehicles, see, https://www.epa.gov/RDEE/energy-resources/calculator.html).

2. Qualitatively discuss the link between GHGs and climate change, and the potential impacts of climate change.

3. Include a summary discussion of ongoing and projected regional climate change impacts relevant to the action area based on U.S. Global Change Research Program assessments. EPA also recommends that the EIS identify any potential need to adapt the proposed action to these effects, as well as any potential impacts from the proposed action that may be exacerbated by climate change.

4. Analyze reasonable alternatives and/or potential means to mitigate project-related GHG emissions.

Aquatic Resources

Wetlands Data: Although the DEIS includes a description of the project area water features and water quality, we are concerned with the lack of baseline wetlands conditions. Baseline information will be important for the decision-maker to assess impacts of the proposed activities. All wetlands acreage in the

analysis area should be quantified and described.

EPA notes Executive Order (E.O.) 11990 - Protection of Wetlands (May 24, 1977) states in pertinent part: "Section 1. (a) Each agency shall provide leadership and shall take action to minimize the destruction, loss or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities for (1) acquiring, managing, and disposing of Federal lands and facilities; and (2) providing Federally undertaken, financed, or assisted construction and improvements; and (3) conducting Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulating, and licensing activities. (b) This Order does not apply to the issuance by Federal agencies of permits, licenses or allocations to private parties for activities involving wetlands on non-Federal property."

Impacts to the types and functions of wetlands in mountain environments are difficult or impossible to mitigate due to shorter growing seasons and low night time temperatures. EPA recognizes the challenges facing the USFS in managing wetland resources in forested montane environments; however, the DEIS should describe how the USFS will show compliance with E.O. 11990, including how wetlands will be identified, avoided or ultimately mitigated. The DEIS should provide the location (map) and a summary of the acreage and current condition of all waters of the United States, including jurisdictional and non-jurisdictional wetlands and streams (ephemeral and perennial) in the project area, as well as a description of any impacts to these areas.

Discharge of dredged or fill material into waters of the United States, including wetlands, are regulated under Clean Water Act (CWA) Section 404. This permit program is administered jointly by the U.S. Army Corps of Engineers (Corps) and EPA. It is unclear in the DEIS whether the Corps was consulted to determine the applicability of CWA Section 404 permit requirements to wetlands in the project area. Please clarify in the Final EIS.

Aquatic resources that are considered "difficult to replace" under the Final Rule for Mitigation for Losses of Aquatic Resources [33 CFR Parts 325 and 332; 40 CFR Part 230 (73 FR 19594, April 10, 2008)] should be avoided. The rule emphasizes the need to avoid and minimize impacts to these "difficult-to-replace" resources and requires that any compensation be provided by in-kind preservation, rehabilitation or enhancement to the extent practicable. Restorations should require that soil profiles and hydrology should be re-established as much as possible to the original state. In addition, EPA recommends the USFS consider the mitigation rule to protect aquatic resources even when a CWA Section 404 permit is not required.

Water Quality Data: We appreciate the water quality data provided in the DEIS and recommend expanding it to include *Escherichia coli*, temperature and turbidity, if they exist. Any significant gaps in data that could affect the decision and/or that should be targeted for collection under the project monitoring plan should also be identified. We recommend incorporating a summary of the water quality data for Meeks Cabin Reservoir rather than simply referencing the UDEQ web site.

Impaired Waterbodies: We appreciate the discussion of CWA Section 303(d) impaired or threatened waterbody segments within, or downstream of, the project area. Because Lyman Lake is identified as a CWA Section 303(d) listed waterbody for low levels of dissolved oxygen, the DEIS should describe how

the proposed project might affect this waterbody, particularly the water quality parameters causing the CWA Section 303(d) listing. Given that fuels treatments are proposed directly adjacent to this lake, this discussion is particularly important. Proposed activities in the drainages of CWA impaired or threatened waterbodies should not cause further degradation of water quality and should be consistent with the State's Total Maximum Daily Load developed for the listed waterbody. Mitigation or restoration activities should be included to reduce existing sources of pollution to offset or compensate for pollutants generated during project activities. Streambank stabilization should utilize bioengineering methods or soft bank protection (as opposed to riprap) to ensure full restoration.

Water Quality Impacts of Beetle Epidemic: We recommend the Final EIS include a watershed analysis that includes a comparison of changes in runoff and flow characteristics resulting from taking no action on the beetle-killed trees vs. salvaging them. Since the science is still unclear with respect to impacts from the beetle epidemic and the beetle kill impacts to watersheds will vary by watershed, we recommend that the Final EIS disclose the positive and negative impacts of both leaving the beetle-killed trees in place and removing them within this particular project area, as well as in the broader context of beetle-killed trees in the Uinta-Wasatch-Cache National Forest.

In addition, the presence and handling of beetle-killed trees has the potential to impact public water supplies if it leads to organic loading of area waterbodies. Organic matter interacts with disinfectants used in the drinking water treatment process to form disinfection byproducts, which are a human health concern. Organic loading may also decrease oxygen levels which can lead to the release of metals such as arsenic, manganese, and iron from sediments. We note the DEIS reference to use of the Meeks Cabin Reservoir by Fort Bridger, Mountain View, and Lyman residents for domestic water. EPA recommends that the Final EIS assess the potential for organic loading impacts to drinking water treatment and supplies.

Impact of Roads on Aquatic Resources: We appreciate the DEIS reference to Forest Guidelines and project specific design criteria/mitigation measures to address impacts from roads on aquatic resources. To reduce adverse impacts to watersheds, we recommend minimization of road construction and road density, as well as locating roads to limit impacts to surface waters. Measures to consider include the following:

- Locate roads away from streams and riparian areas where possible;
- Locate roads away from steep slopes, landslide prone areas, and erosive soils;
- Minimize the number of road stream crossings;
- For road stream crossings that are unavoidable, construct during periods of low flow to avoid fish spawning and incubation periods, and/or dewater relevant stream segments prior to construction;
- Provide adequate road drainage and control of surface erosion to avoid routing sediment to streams;
- Use bottomless or textured bottom culverts if possible; and
- Design roads to allow for natural drainage patterns.

In addition, the DEIS notes that no activities are proposed within an Inventoried Roadless Area (IRA). Given that the basic premise of the Roadless Area Conservation Rule is to prohibit road construction and timber harvesting in IRAs, we recommend that the discussion be expanded to disclose whether any IRAs

are included in the project analysis area, and if so, efforts to ensure that no treatments will occur in them. Finally, given the recent court conclusion that logging roads are point sources and thus require National Pollutant Discharge Elimination System (NPDES) permits as a source of industrial stormwater, the EIS should acknowledge that any new and recommissioned logging roads necessary for the project may require permit coverage. See *Northwest Envt'l Def. Ctr. v. Marvin Brown, Oregon State Forester* no. 07-35266 (9th Cir. Aug. 17, 2010).

Design Criteria, Mitigation, and Monitoring: Most activities contemplated under this project (including salvaging/thinning trees, prescribed burning and constructing new temporary roads) may potentially impact water resources. We are pleased with the selection of project design criteria, mitigation and monitoring measures to reduce the potential for impacts. We recommend expanding measures, as follows: require revegetation of all disturbed areas with native seed mix within the same growing season they are disturbed and monitor revegetation efforts for five years to ensure success; specify steps to protect range improvements from salvage operations and prescribed burning (as identified in Table 3.31); monitor breakdown of hydrophobic soils for five years post prescribed burn; and monitor impacts to water quality from prescribed burn treatments proposed immediately adjacent to Meeks Cabin Reservoir. In addition, for the design of stream crossings, we support Best Management Practices (BMPs) to prevent sedimentation of surface waters and restoration as soon as possible to prevent sedimentation flow into streams. The BMPs should be inspected and maintained frequently and should be adjusted in response to inspection findings to protect streams (including fishery spawning areas), wetlands, and riparian corridors from adverse impacts associated with vegetation management activities.

Habitat and Special Status Species

The project area may contain special status species, including Endangered Species Act-listed threatened species (Canada lynx). Therefore, we recommend coordination with the U.S. Fish and Wildlife Service (USFWS) on this project. The DEIS should disclose the project's impacts to threatened, endangered and sensitive (TES) species, the results of USFWS coordination, and any related requirements such as design criteria and monitoring measures selected to reduce potential impacts to TES species from the various project activities.

Table 3.26, Federally Listed Species, Summit County, Utah, lists the presence of Canada lynx habitat in the project area, references two lynx analysis units (LAUs) that were surveyed for evidence of lynx, and notes that presence of lynx is "unknown." We recommend erring on the conservative side by disclosing potential project effects on Canada lynx (even though presence is unclear) and its habitat, including the number of acres of LAUs within or near the project analysis area and the number of acres of salvage and prescribed fire treatments in project area LAUs. An expanded discussion to support your determination that project activities "may affect, not likely to adversely affect" Canada lynx should be included.

To protect the significant number of migratory bird species in the project area, we recommend coordination with the USFWS, Utah Division of Wildlife Resources and Wyoming Game and Fish Department to develop adequate design criteria, mitigation and monitoring measures to ensure that project activities do not negatively impact habitat for migratory birds, bald eagles, and other species. We support the DEIS requirement for annual monitoring to determine occupancy and location of active nest sites/areas in all northern goshawk territories and recommend that this monitoring take place

immediately prior to initiating project activities each season. In addition, we recommend adding a wildlife resources design criteria measure to the EIS to document your intent that no more than 10% salvage treatment would occur in the goshawk post-fledgling family areas or their territory as a whole.

The project specific design criteria and mitigation measures include the use of "Wasatch-Cache native seed mix" for reseeding efforts following harvest operations and road closures. To provide for a more effective revegetation strategy, a seed bank system that contains a diverse collection of Uinta-Wasatch-Cache National Forest native plants would be a valuable tool and worth developing in conjunction with this project (if not already in existence). Establishing such a system would allow the Evanston-Mountain View Ranger District to plant and mat this native seed mixture during any season while maximizing the potential for success on all revegetation activities for this project and future projects. By looking to the natural response of the ecosystem to provide seeds of healthy, diverse native plants that occupy most of the available niches in the area, invasive plant infestations can be minimized.

We appreciate that project specific design criteria and mitigation measures are identified for noxious weeds. In addition, the DEIS should provide the current state of invasive species in the project area, and how each alternative would impact the problem. As you know, these species tend to gain a foothold where there are disturbances in the ecosystem, such as those related to vegetation removal and road construction. The EIS should describe how project actions will incorporate the guidance of the Region 4 Invasive Species Management Strategy to address prevention, early detection and rapid response, control and management, and restoration and rehabilitation of invasive species. In addition, the DEIS should incorporate a summary discussion of expected herbicide use for control of weeds in disturbed areas, including types of herbicides used, potential impacts and required mitigation measures (rather than referring the reader to the Forest Noxious Weed EIS). We support the DEIS monitoring requirement to monitor weed infestations as long as necessary until natural vegetation has been established.

Additional Comments

National Historic Preservation Act: As noted in the DEIS, concurrence is still pending from the Utah State Historic Preservation Officer (SHPO) regarding your determination that the proposed project would have of no adverse effect to historic properties. We recommend follow-up with the Utah SHPO to ensure that compliance with National Historic Preservation Act Section 106 consultation requirements can be adequately documented in the Final EIS.

Environmental Justice: EPA recommends a robust environmental justice analysis. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations," applies to federal agencies that conduct activities that substantially affect human health or the environment. In accordance with this order, the EIS should disclose and evaluate any environmental justice concerns associated with impacts to rural low-income communities from project activities. Close coordination with any potentially impacted Native American tribes is encouraged.

We note the DEIS includes an environmental justice review for this project. To ensure a robust analysis, we encourage the USFS to consult the Council on Environmental Quality's new posting of resources on NEPA and environmental justice at http://ceq.hss.doe.gov/nepa_information/agency_resources.html. The EIS should consider socio-economic impacts to the local communities, including any additional loading

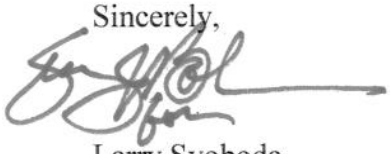
placed on local communities' abilities to provide necessary public services and amenities resulting from implementation of project activities. Such impacts may include housing and school needs for project workers and families, burdening existing waste and wastewater handling facilities, and increased road traffic with associated dust and hazardous material spill potential. Methods to avoid or minimize such impacts should be discussed.

EPA's Rating and Recommendation

Consistent with Section 309 of the Clean Air Act, it is EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, EPA is rating this DEIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. The "2" rating indicates that EPA has identified additional information, data, analyses, or discussion that should be included in the Final EIS. A full description of EPA's rating system is enclosed.

We hope that our comments regarding air quality, aquatic resources, and habitat and special status species will assist you in further reducing the environmental impacts of this project. We appreciate the opportunity to review and comment on this DEIS. If we may provide further explanation of our comments, please contact me at 303-312-6004, or your staff may contact Amy Platt at 303-312-6449.

Sincerely,



Larry Svoboda
Director, NEPA Compliance and Review Program
Ecosystems Protection and Remediation

Enclosure

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements

Definitions and Follow-Up Action*

Environmental Impact of the Action

LO - - Lack of Objections: The Environmental Protection Agency (EPA) review has not identified any potenual environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC - - Environmental Concerns: The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO - - Environmental Objections: The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts

EU - - Environmentally Unsatisfactory: The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 - - Adequate: EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information

Category 2 - - Insufficient Information: The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 - - Inadequate: EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment February 1987